

GREENBERG TRAURIG, LLP
10845 Griffith Peak Dr., Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

JOEL E. TASCA, ESQ.
Nevada Bar No. 14124
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: 702.792.3773
Email: joel.tasca@gtlaw.com

Counsel for Defendant Wilmington Finance, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ONORIO RAMOS,

Plaintiff,

vs.

SABLES, LLC, a Nevada limited liability company; WILMINGTON FINANCE, INC., a Delaware corporation; DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAMP TRUST 2007-HSBC1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-HSBC1; DOES I through X and ROE BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:25-cv-00776-APG-BNW

**STIPULATION TO EXTEND TIME FOR
DEFENDANT WILMINGTON FINANCE,
INC. TO RESPOND TO COMPLAINT**

Defendant, Wilmington Finance, Inc. (“Wilmington”), and Plaintiff, Onorio Ramos (“Ramos”), stipulate that Wilmington shall have up to and including August 20, 2025, to file their response to Plaintiff’s Complaint, should no Amended Complaint be filed on or before that date¹. Good cause exists for this extension because it would be a waste of resources for Wilmington to respond to the original complaint after Plaintiff has expressed his intention to file an amended

¹ On July 21, 2025, Plaintiff filed its Stipulation and Order to File Amended Complaint (Dkt. 25) by August 11, 2025.

1 complaint in the coming weeks. This stipulation is not intended to cause any delay or prejudice to any
2 party.

3 **IT IS SO STIPULATED.**

4 DATED this 30th day of July, 2025.

5 **HONG & HONG LAW OFFICE**

6 **GREENBERG TRAURIG, LLP**

7 /s/ Joseph Y. Hong

8 /s/ Joel Tasca

9 Joseph Y. Hong (NV Bar No. 5995)
10 1980 Festival Plaza Dr., Suite 650
11 Las Vegas, NV 89135

12 Joel E. Tasca (NV Bar No. 14124)
13 10845 Griffith Peak Drive, Suite 600
14 Las Vegas, NV 89135

15 *Attorney for Onorio Ramos*

16 *Attorneys for Wilmington Finance, Inc..*

17 **IT IS SO ORDERED.**

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: July 31, 2025

21 GREENBERG TRAURIG, LLP
22 10845 Griffith Peak Dr., Suite 600
23 Las Vegas, Nevada 89135
24 Telephone: (702) 792-3773
25 Facsimile: (702) 792-9002

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the **30th day of July, 2025**, a true and correct copy of the foregoing **STIPULATION TO EXTEND TIME FOR DEFENDANT WILMINGTON FINANCE, INC. TO RESPOND TO COMPLAINT** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

Chris Darling

An employee of Greenberg Traurig, LLP